

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**DEAN R. BARRETT,**

Plaintiff,

vs.

**Case Number: 4:17-cv-00985-BCW**

**SELENE FINANCE LP,**

Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
MOTION FOR ATTORNEY'S FEES AND INCENTIVE AWARD**

Plaintiff Dean Barrett respectfully moves the Court for an Order extending the deadline for Plaintiff to file a motion for attorneys' fees and incentive award by seven (7) days, up to and including October 8, 2018. In support, Plaintiff states as follows:

1. On August 30, 2018 the Court entered an Order certifying the settlement class, granting preliminary approval of the class action settlement, and directing notice to the class (Doc. 49).
2. The Settlement Agreement requires the parties to attempt to agree on Class Counsel's attorneys' fees as they are paid in addition to the Settlement Fund to the Class. As such, the Court ordered that Class Counsel is to file any fee petition within 30 days of the entry of the preliminary approval order (Doc. 49 at 6 ¶ 12). Accordingly, Plaintiff must file his fee petition by October 1, 2018.

3. Good cause exists to grant the requested extension because the Parties have been, and continue, to negotiate in good faith regarding the amount of attorneys' fees. In an effort to avoid unnecessarily incurring additional attorneys' fees preparing and litigating a fee petition,

Plaintiff requests an extension of seven (7) days so that negotiations can continue.

4. Plaintiff has not previously requested an extension of time to file a fee petition.
5. Plaintiff has conferred with counsel for the Defendant, who has consented to the requested extension.
6. The requested extension is not sought for the purposes of delay, and will not affect any other deadline in the Court's preliminary approval order.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order granting a seven-day extension of time for Plaintiff to file a fee and incentive award petition, up to and including October 8, 2018.

Dated: September 25, 2018

*Respectfully Submitted,*

By: /s/ A.J. Stecklein

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-and-

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**CERTIFICATE OF FILING**

I hereby certify that the foregoing document was filed electronically with the Clerk of the Court's ECF/CM system on September 25, 2018, which will automatically generate notice of filing to all counsel of record.

/s/ A.J. Stecklein  
Attorney for Plaintiff